

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA

Plaintiff,

vs.

STEPHEN LAWRENCE,

Defendant.

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No. 4:20CR 613 SRC

**DEFENDANT’S SENTENCING MEMORANDUM AND REQUEST FOR A
VARIANCE**

Stephen Lawrence is a hard-working veteran who is active in his church and community. He is supportive of his daughter and is willing to spend his future dedicated to treatment and recovery. His honesty and accountability are apparent in his treatment progress and his long-time employer’s willingness to rehire him despite his circumstances. *See* Exhibit A and Pre-Sentence Report (“PSR”) ¶ 69.

Lawrence is a first-time offender, and given his age and history he is at a very low risk to recidivate. Until his involvement in the present offense, Lawrence did not have any criminal history. While his offense is serious, so is his commitment to overcome this behavior.

He is amenable to any treatment proposed by the Court or the Office of Probation. He only wants to continue to work and support his daughter and granddaughter as well as his church. Provided the opportunity and given his track record

while on pretrial supervision, Lawrence will be successful in his endeavors. If his home plan is not in compliance with the sex offender registry requirements, he will relocate to a suitable home pan.

Conclusion

Consideration for a variance is appropriate for Lawrence based upon his history and characteristics, particularly his physical health, post-offense rehabilitation, work history, willing to engage in treatment, and lack of criminal history.

WHEREFORE, Defendant Stephon Lawrence requests this Court impose a below guideline sentence and to consider a non-custodial sentence.

Respectfully submitted,

/s/ Brocca Morrison
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CERTIFICATE OF SERVICE

I hereby certify that on the 28th day of December, 2021, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the Assistant United States Attorney and the United States Probation Office.

/s/Brocca Morrison
BROCCA MORRISON
Assistant Federal Public Defende